

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 11
)	
W.R. Grace & Co., et al.,)	Case No. 01-01139 (JKF)
)	(Jointly Administered)
)	
Debtors.)	Objection Deadline: April 13, 2007
		Hearing Date: May 2, 2007 at 2:00 P.M.

NOTICE OF MOTION

ZAI Claimants have filed the attached *ZAI Claimants' Motion for Discovery Concerning W.R. Grace's Conduct in the ZAI Summary Judgment Proceedings* (the "**Motion**").

The Motion seeks a ninety-day time period to conduct discovery regarding W.R. Grace's Conduct in submitting and continuing to urge the ATSDR Study to this Court as competent evidence in the ZAI Summary Judgment Proceedings in light of its actions in successfully excluding the same ATSDR Study in proceedings in Montana as incompetent and inadmissible evidence.

If you wish to file a response to the Motion, you must do so on or before **April 13, 2007 at 4:00 p.m. EDT.**

At the same time, you must also serve a copy of the response upon Movant's attorneys at the addresses set forth in the signature block below.

HEARING ON THE MOTION will be held on **May 2, 2007 at 2:00 P.M. EDT.**

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

(signature block on following page)

Dated: March 28, 2007
Wilmington, Delaware

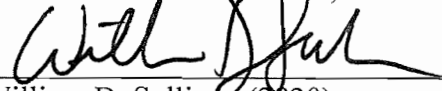
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